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6 Counsel for Defendant
Thaddeus Julian Culpepper

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9 IN THE UNITED STATES DISTRICT COURT
10 FOR THE CENTRAL DISTRICT OF CALIFORNIA
11 SOUTHERN DIVISION

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 v.
15

16 THADDEUS JULIAN CULPEPPER,

17 Defendant.
18

Case No. 18-CR-00685-CJC
Honorable Cormac J. Carney

**STIPULATION OF THE PARTIES RE
DEFENDANT’S CRIMINAL HISTORY**

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20 IT IS HEREBY STIPULATED AND AGREED by and between Plaintiff, United
21 States of America, by and through Assistant United States Attorney Ali Moghaddas, and
22 Defendant Thaddeus Julian Culpepper (“Mr. Culpepper”), by and through counsel, Jessica
23 C. Munk, that Mr. Culpepper has one criminal history point, yielding a Criminal History
24 Category of I under the United States Sentencing Guidelines, based on the below
25 calculation:

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Date	Offense	Classification	Sentence	Criminal History Points
8/23/16	Reckless Driving Cal. VC 23103 Nolo Contendere	Misdemeanor	3 years' probation	1 §4A1.1(c); §4A1.2(c)(1)
5/28/93	Trespass Cal. PC 602(j) Nolo Contendere	Misdemeanor	24 months' probation	0 §4A1.2(e)(3) > 10 years
5/11/93	Trespass Cal. PC 602(j) Nolo Contendere	Misdemeanor	2 years' probation	0 §4A1.2(e)(3) > 10 years

The parties respectfully request that the Court: (1) adopt the above criminal history calculations for purposes of determining defendant's advisory sentencing guidelines range; and (2) based on this calculation and the plea agreement's offense level calculation, sentence defendant in accordance with the parties' plea agreement. If the Court is inclined to follow the time-served sentencing recommendation in the plea agreement, the parties are available to proceed to defendant's sentencing following Mr. Culpepper's change of plea on September 15, 2022. Mr. Culpepper has also signed a time-served plea agreement in *U.S. v. Culpepper*, No. 20-00009-DOC (*see* Dkt. 80).

Dated: September 12, 2022

Respectfully submitted:

WIECHERT, MUNK & GOLDSTIEN, PC

By: s/ Jessica C. Munk
Jessica C. Munk
Counsel for Defendant
Thaddeus Julian Culpepper

Dated: September 12, 2022

STEPHANIE S. CHRISTENSEN
Acting United States Attorney

By: s/ Ali Moghaddas (with authorization)
Ali Moghaddas
Assistant United States Attorney

CERTIFICATE OF SERVICE

I, Danielle Dragotta, an employee of the Wiechert, Munk & Goldstein, PC, located at 27136 Paseo Espada, Suite B1123, San Juan Capistrano, CA 92675, declare under penalty and perjury that I am over the age of eighteen (18) and not a party to the above-entitled proceeding.

On September 12, 2022, I served the forgoing documents, described as **STIPULATION OF THE PARTIES RE DEFENDANT'S CRIMINAL HISTORY** on all interested parties as follows:

[X] **BY MAIL:** I caused such envelope(s) to be deposited in the mail at San Juan Capistrano, California with postage thereon fully prepaid to the office of the addressee(s) as indicated on the attached service list. I am "readily familiar" with this firm's practice of collection and processing correspondence for mailing. It is deposited with the U.S. Postal Service on that same day in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after the date of deposit for mailing in affidavit.

Thaddeus J. Culpepper
Reg. #77028112
Metropolitan Detention Center – Los Angeles
Post Office Box 531500
Los Angeles, CA 90053-1500

[X] **BY E-MAIL:** I caused the document(s) to be transmitted electronically by filing the forgoing with the clerk of the District Court using the CM/ECF system, which electronically notifies counsel for all parties.

[X] **FEDERAL:** I declare that I am employed in the office of a member of the Bar of this court at whose direction the service was made.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on September 12, 2022, at San Juan Capistrano, California.

s/Danielle Dragotta

Danielle Dragotta